

**Safeguarding
&
Code of Conduct**
Annual Report 2022

Introduction

The Danish Refugee Council (the “DRC”) hereby presents its Safeguarding & Code of Conduct Annual Report 2022 (the “Annual Report”).

The Annual Report has been produced by the Safeguarding & Code of Conduct Unit (HQ) in collaboration with the Regional Safeguarding & Code of Conduct Coordinators. The Annual Report was reviewed and commented by the Gate B (HQ) Intake Committee and the Global Accountability and Participation Advisor, approved by the Executive Director People & Organisation and endorsed by the Executive Management Team.

The Safeguarding & Code of Conduct Annual Report aims at promoting transparency internally and externally by sharing data in relation to DRC’s complaint mechanism (the “Code of Conduct Reporting Mechanism” or “CoCRM”) and at upholding accountability for addressing misconduct promptly and appropriately through an update regarding on DRC's actions, processes, and investigation outcomes.

The Annual Report further allows DRC’s Workforce and management specifically to identify areas of concern, implement necessary improvements, and develop strategies for preventing future misconducts, based on the analysis of current data, trends, and patterns.

Finally, it updates the public with project developments, progress and good practices in the Safeguarding and Code of Conduct area, which enables improvement of future measures and actions, creates a safe and respectful work environment, reinforces the DRC's values, and fosters a culture of integrity.

Executive Summary

Revision of the Code of Conduct and Restructuring of the Code of Conduct Reporting Mechanism

DRC has had a Code of Conduct since 2007, and a Code of Conduct Reporting Mechanism (CoCRM) since 2012. They are cornerstones of DRC's commitment to accountability and integrity.

The Code of Conduct was revised and approved in December 2022. It is now being rolled-out in the contract of all members of DRC's Workforce globally. It maintains explicit adherence to the 'IASC 6 Core Principles' (PSEA) and the Core Humanitarian Standard (CHS).

The CoCRM functions as a Whistleblower mechanism in which a breach or a concern relating to the Code of Conduct may be reported confidentially. The CoCRM is accessible to all, including anonymous people. In 2021, the CoCRM was adapted to the Danish Whistleblower Act in order to allow the report of misconduct and concerns affecting DRC in Denmark, and in 2022 the CoCRM was partially restructured in order to support the professionalization of investigations in DRC as well as the conduct of safeguarding activities in DRC.

Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)

DRC continues to focus on protection from SEAH and has established a PSEAH taskforce (the "PSEAH Taskforce"). This has been a co-initiative of the Donor Compliance, Effectiveness, Knowledge and Learning (MEAL) and Safeguarding & Code of Conduct teams in HQ.

The PSEAH Taskforce reports to DRC's Global CHS Steering Committee. It brings institutional support to the new position of Safeguarding (PSEAH) Global Advisor.

A network of PSEAH focal points was also designed to be established at all levels of DRC with the appointment of full time Safeguarding & Code of Conduct Regional Coordinators (ReSCOs) in each of DRC's regions, and the designation of Safeguarding & Code of Conduct Focal Point in all DRC's operations.

Professionalisation of Investigations

In parallel to the above developments and case handling process, the Safeguarding & Code of Conduct Unit has also developed DRC's first internal investigation training scheme which notably embeds DRC's survivor centred approach (the "Survivor Centred Approach").

The training was piloted twice in June 2022 (Nairobi, DRC EAGL Regional Office), and November 2022 (Warsaw, Poland Office-Ukraine Response).

Continuous Increase of Reports of Suspected Misconduct (RSMs)

Since 2018, the number of reports (RSMs) received has been continuously and steadily increasing. In 2022, the increase was similar to 2021 (12,4%):

This increase is notably a sign that important developments, awareness and engagement of the different stakeholders have heightened reliance and visibility in DRC’s reporting mechanism. Other factors such as the adoption of Whistleblower regulations and the “#me too” movement are also certainly contributing to this steady increase.

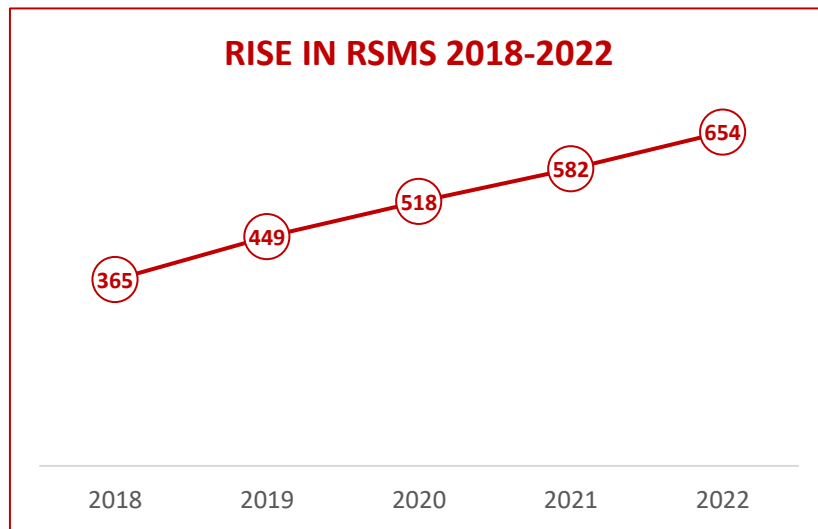


Chart 1

Gate A (Country) is the gate that is the most utilized to report misconducts. Gate B which is responsible for handling SEAH and high scale fraud & corruption allegations has also received a noticeable number of reports:

Gate (Level)	2018	2019	2020	2021	2022
Gate A (Country)	254	286	318	365	392
Gate A+ (Region)	8	14	24	29	35
Gate B (HQ)	103	149	176	188	227
Total (Global)	365	449	518	582	654

Table 1

The most complained about misconduct in 2022 remains “fraud & corruption”. It is understood that the definition of “Fraud & Corruption” is broad and for example encompasses conflicts of interest or nepotism.

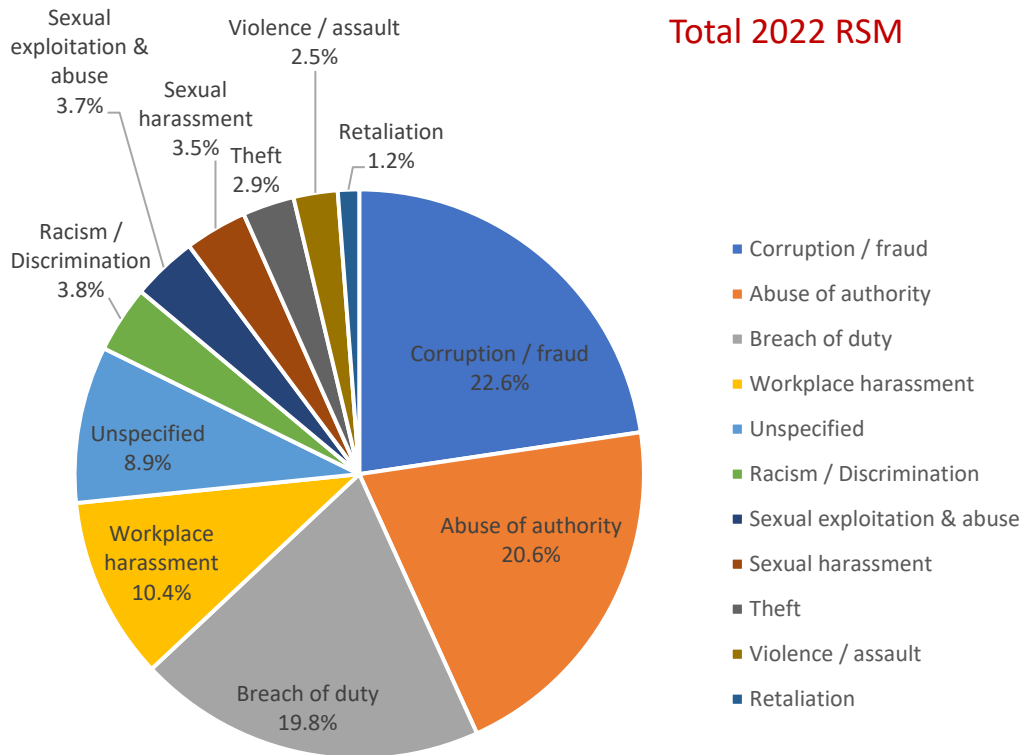


Chart 2

Investigations only take place in the most severe situations (fraud & corruption, SEAH, discriminations etc.). Otherwise, the RSMs will certainly be referred.

The number of RSM referred to management by the committee in charge of the response (the “Intake Committee”) remains high (37%) and constitutes the main response given by the CoCRM to Reports of Suspected Misconduct.

The importance of this response may suggest that whistleblowers (the “Reporting Persons”), and notably staff members, do not feel sufficiently safe to speak to their colleagues and managers to solve minor misconduct or disputes at the workplace. In some instances, the claims can also be purely contractual or not related to the Code of Conduct which outlines the need for continuing internal and external communication around the CoCRM. The revision of the Code of Conduct in 2022 was an important development made in that regard.

The second response given by Intake Committees is “investigation” (23%). In 2022, DRC has launched 137 investigations compared to 139 in 2021. The number of investigations is thus steady, which evidences an increased capacity of the Intake Committees to utilize investigations for the most severe misconduct only.

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I. Revision of the Code of Conduct

In 2022, DRC undertook the important project to revise its Code of Conduct with the objectives to highlight DRC’s commitment to the Core Humanitarian Standard (the “CHS”) and the IASC Six Core Principles on SEA notably, to adopt a single standard of behaviour for all DRC’s workforce (the “Workforce”) and provide clarification to the members of the Workforce, DRC’s management and Code of Conduct investigators in the course of their duties.

This new Code of Conduct will apply to DRC and to its Workforce without distinction. All Staff Members including but not limited to international or national Staff, Managers or not, frontline, support or programme Staff, paid or unpaid trainees, students and Irregular Workers are equally obliged by DRC’s Code of Conduct. It is an integral part of their terms and conditions of engagement with DRC. This Code of Conduct therefore has a contractual nature.

DRC’s implementing partners are also required to abide by the Code of Conduct, or to have and employ their own that either meets or exceeds DRC’s. DRC’s suppliers are required to abide by DRC’s Suppliers Code of Conduct and DRC’s General Conditions of contract.

DRC’s Workforce is provided with key information such as the list of breach which are considered severe in nature and hence likely to trigger an investigation (Sections 4 to 9 of the Rules of Conduct), clear definitions of concepts such as “Fraud & Corruption”, “Sexual Harassment”, “Discrimination” etc., and an outlook of the main reporting lines. Additionally, DRC’s Workforce is provided with a guidance note which helps interpreting certain points and linking the provisions of the Code of Conduct regarding PSEAH to the IASC Six Core Principles.

Finally, supported by the statement of the Secretary General, the new Code of Conduct emphasizes on the requirement to fast-track RSMs containing PSEAH allegations by reporting them immediately and directly to the Gate B (HQ) of DRC’s CoCRM.

Meet the new Code of Conduct



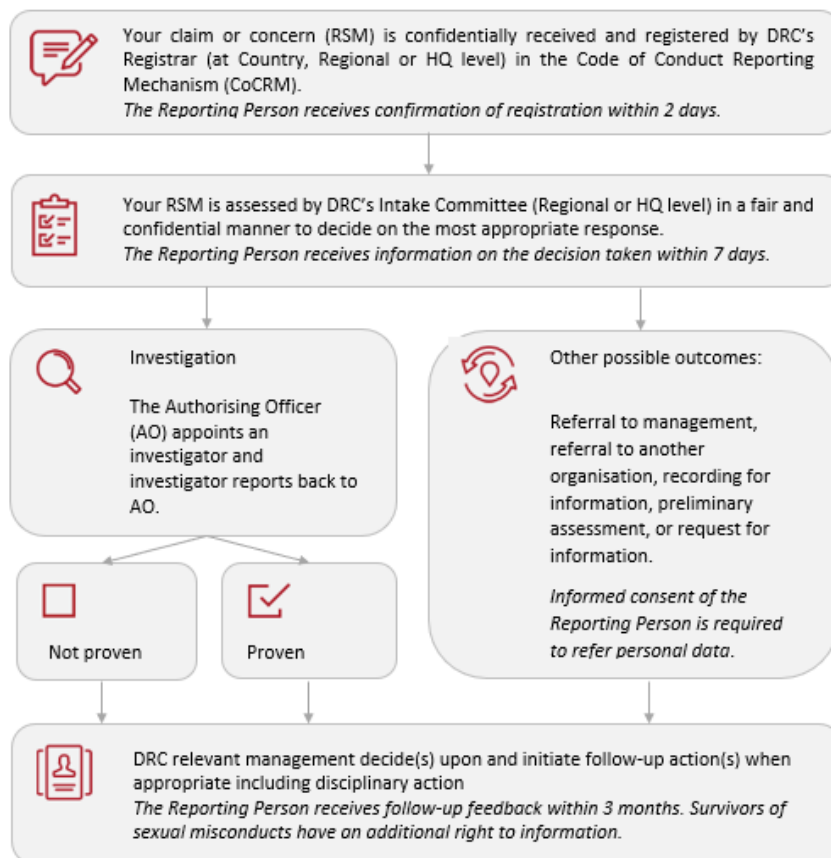
The new Code of Conduct will be rolled-out until the end of 2023. It will be translated and published shortly on DRC’s webpage ([Code of Conduct | DRC Danish Refugee Council](#)).

II. Restructuring of the Code of Conduct Reporting Mechanism (CoCRM)

In 2022, DRC also restructured its Code of Conduct Reporting Mechanism to ensure that a CoCRM is in place and that it is functioning in all DRC’s operations, of professionalising investigations and of enhancing safeguarding activities while increasing confidentiality and independence of the system.

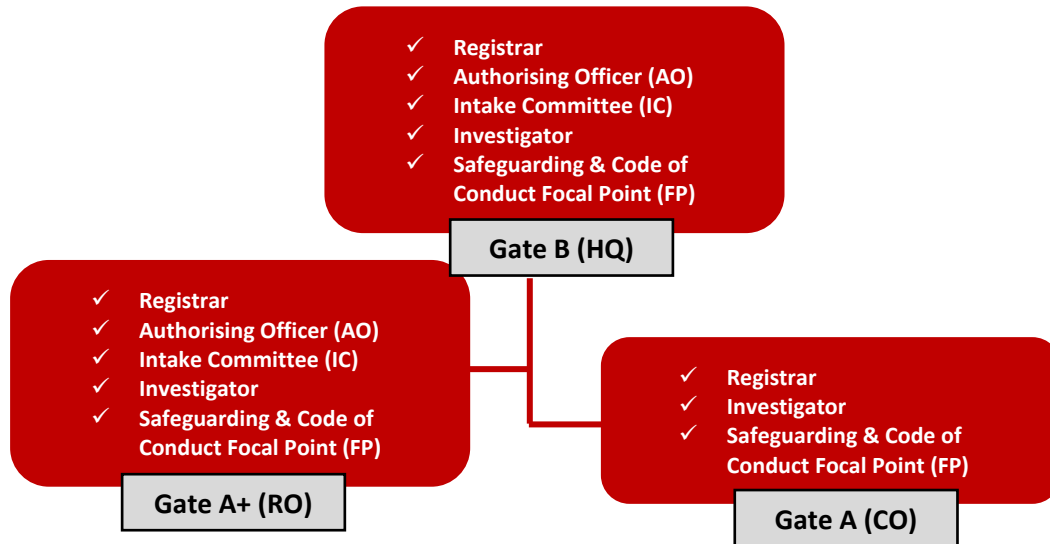
The CoCRM continues to be built around five (5) functions (the “Safeguarding & Code of Conduct Functions” or “Functions”) and the processing of RSMs will remain unchanged:

- i) a Registrar (in charge of the registration of RSMs),
- ii) an Intake Committee (in charge of deciding on a response to RSMs),
- iii) an Authorising Officer (chairing the Intake Committee, authorising and monitoring investigations),
- iv) an Investigator (in charge of the investigation) and
- v) a Safeguarding & Code of Conduct Focal Point (in charge of liaising with Survivors and rolling-out safeguarding activities).



Graphic 1

However, the five (5) Safeguarding & Code of Conduct Functions will no longer be equally distributed among the different levels of the organisation. The Gate A+ (Region) and Gate (B) levels will continue to hold the five (5) Functions, while the Functions of Intake Committee and Authorising Officer are deleted at Gate A (Country) level. Gate A (Country) remains an important entry point of the CoCRM with the presence of a Registrar. Exceptions and adaptations may apply in regard to applicable whistleblower laws.



Graphic 2

The Functions of Authorising Officer are ex-officio held by the Code of Conduct Global Advisor (HQ) and the four (4) Regional Safeguarding & Code of Conduct Coordinators (the « ReSCOs »). This structure will ensure that the authorisation, monitoring and reporting on investigations is always conducted by a full-time professional.

Registrars are maintained at Gate A (Country) level in order to ensure that all DRC legal entities allow the report of misconduct in person and that the CoCRM allows the referral of sensitive feedback from the local Community Feedback Mechanism (the « CFM »). Additionally, each of DRC’s legal entities will appoint a Safeguarding & Code of Conduct Focal Point in charge of raising awareness, conducting PSEAH activities and liaising with Survivors of SEAH allegations when appropriate. Investigators will be trained and available at all levels of the organisation in order to ensure contextualisation and flexibility when setting the relevant investigation team in regard to the risks and needs identified.

At Gate A+ (Region) and Gate B (HQ) levels, the composition of Intake Committees is streamlined. The members of the Intake Committees are appointed by the relevant Executive Director, which also means that the Executive Directors cannot themselves be members of it, and core expertise must be represented (e.g. finance, supply chain, protection, safety etc.).

Main Benefit Expected

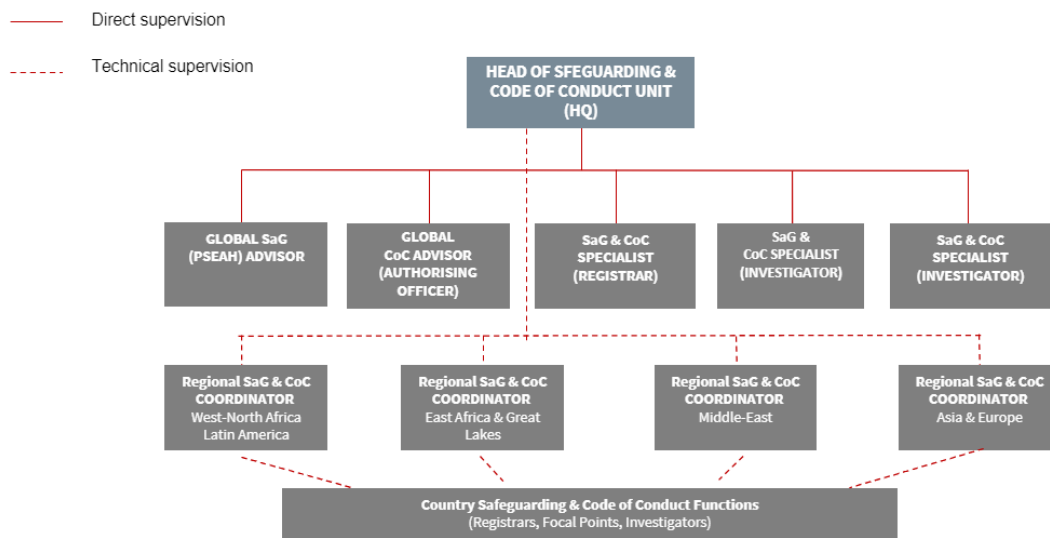
Nr.	Benefit	Description	KPI
1.	Accessibility of the CoCRM	The CoCRM is always accessible in all DRC’s operations and duly connected with the relevant Community Feedback Mechanism at Country level.	100% of DRC’s operations have appointed a Registrar.
2.	Conduct of investigations	The global time necessary to process an RSM with investigation (from the date of receipt to the date of closure) is reduced.	The time to conduct investigation is reduced by 10% per year.

III. Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)

In 2022, DRC dedicated important attention and resources into the prevention and response to SEAH incidents in the frame of its organisational transformation.

A Global Safeguarding (PSEAH) Advisor was appointed to lead the global « safeguarding » aspect of the Safeguarding & Code of Conduct structure which includes the Regional Safeguarding & Code of Conduct Coordinators at regional level (full time positions) and the Safeguarding & Code of Conduct Focal Points at Country level. This structure will allow DRC to continue developing PSEAH policies and protocols while supporting the effective dissemination of safeguarding activities at all levels of the organisation in a coordinated manner.

SAFEGUARDING & CODE OF CONDUCT STRUCTURE



Graphic 3

These structural and resource developments have been supported by the establishment in March 2022 of a Global PSEAH Task Force at the initiative of the Donor Compliance, Effectiveness, Knowledge and Learning (MEAL) and Safeguarding & Code of Conduct teams in HQ. The purpose of the PSEAH Task Force is to strengthen DRC’s commitment to prevent and respond to SEAH concerns and to guide DRC in developing a more compliant, protective and holistic approach to address PSEAH.

Specifically, the objectives of the PSEAH Task Force are to

- i) Inform DRC on ways forward to immediately address identified PSEAH gap in line with donor requirements,
- ii) Advise DRC on actions to strengthen DRC's PSEA efforts within the available resources and by examining additional resources required for future investments,
- iii) Advise and provide technical guidance to the Safeguarding (PSEAH) Global Advisor,
- iv) Support PSEAH mainstreaming across DRC, at all levels, in accordance with the PSEAH-related needed actions, which form part of a Safeguarding (PSEAH) action plan.

The PSEAH Task Force meets on a quarterly basis, and more if needed. It reports to the DRC's Global CHS Steering Committee. The PSEAH Task Force members are appointed by the same CHS Steering Committee, and the current composition includes both field and HQ staff representing Safeguarding & Code of Conduct, the directorship of DRC, Protection, Accountability to Affected Populations, Legal, and HR experts.

CoCRM Data on PSEAH

DRC holds sexual harassment, exploitation and abuse to constitute particularly egregious forms of misconduct, not least because of the severe impact such misconduct can have on survivors. The specific focus on data related to these forms of misconduct here reflects the importance DRC assigns to tackling it.

Key take-aways

- 68 RSMs containing sexual allegations (i.e. to either sexual harassment, sexual exploitation and abuse, or a combination of these) were received and registered during 2022. 71 Subject cases have been open following these reports (an RSM can contain several Subject's cases).
- Sexual harassment (SH) type of misconduct represents 3,5% while Sexual Exploitation and Abuse (SEA) represents 3,7% of all occurrences (in other words, RSMs have been tagged with SH in 3,5% of the times, and with SEA in 3,7% of the times).
- Similarly to 2021, DRC launched 47 investigations into suspected sexual misconduct over the course of 2022. 4 Subject cases were referred to another organisation because the Subjects were not employed by DRC at the time of the allegations and the former employer could be identified.
- 9 out of the 47 investigations concluded with a proven report. 2 investigations are still open. The 36 remaining investigations were not substantiated, which is either due to a lack of available evidence, the absence of misconduct or the refusal of the Survivor(s) to consent to such investigation.

IV. Professionalisation of Internal Investigations

DRC has engaged in the professionalisation of internal investigation notably by restructuring the CoCRM and appointing Regional Safeguarding & Code of Conduct Coordinators in each of its Region as part of the core regional structure, but also by developing its own internal investigation training scheme.

In 2022, the Safeguarding & Code of Conduct Unit developed an in-house Fraud & Corruption investigation training scheme in line with the Book of Knowledge on PSEAH investigations developed by the CHS. This investigation scheme has been piloted twice in the East-Africa & Great Lakes and Asia & Europe Regions during 2022 which resulted in the training of forty (40) new investigators and one (1) trainer.

The training scheme is composed of three (3) parts, a requirement to take DRC's Code of Conduct and CHS's Foundation of SEAH investigations online trainings, a four (4)-day workshop in person, and a moot interview in relation with one of the case scenarios studied during the in-person workshop.

During the in-person workshop, participants are trained on the following topics through multiple case scenarios:

- i) Session 1: Identifying the elements of an allegation,
- ii) Session 2: Planning an investigation,
- iii) Session 3: Collecting evidence,
- iv) Session 4: Conducting an interview,
- v) Session 5: Assessing evidence,
- vi) Session 6: DRC's Survivor Centred Approach,
- vii) Session 7: Reporting on investigations (incl. Donor reporting).



V. CoCRM Data Analysis

The data for this report was extracted from the system on 7th March 2023. Despite the steady increase of RSMs received, it can be noted that the number of SEAH allegations has not followed this trend, the number of investigations remains steady while the time taken to process RSMs is dropping significantly, which evidence the new and more professional approach DRC is taking to maintain a fully functional complaint mechanism and to refer to management minor misconducts in a timely manner.

Number of Registered RSM

DRC received 654 reports in 2022¹ compared to 582 in 2021 which represents a 12,4 % increase in reporting and further confirmation of the upward trend in reporting that DRC has experienced since 2016.

Gate (Level)	2018	2019	2020	2021	2022
Gate A (Country)	254	286	318	365	392
Gate A+ (Region)	8	14	24	29	35
Gate B (HQ)	103	149	176	188	227
Total (Global)	365	449	518	582	654

Table 2

The continuous rise in number of RSMs received between 2019 and 2022 is an indication that the intake of RSMs is reaching a level more equal to the effort invested into outreach and development. The level of maturation of the mechanism should not obscure the fact that the ability to adapt to local contexts is as important as to build a well-structured mechanism.

As the following table shows, there are still some countries which register a limited number of RSMs (or none):

Country	Gate A	Gate A+	Gate B	Total
Iraq	56	4	30	90
Colombia	66		14	80
Yemen	38	1	12	51
Afghanistan	33		13	46
Myanmar	30		11	41
Bangladesh	24		14	38
Lebanon	19	1	10	30
DR Congo	11	3	13	27
Uganda	20	1	6	27
Turkey	16	1	9	26
Nigeria	7		15	22

¹ The data presented in the Annual Report reflects a “snapshot” of the data in the CoCRM database as of 7 March 2023. Consequently, the data here may differ from that shown on DRC’s public online dashboard that provides an updated overview of certain elements of CoCRM-related data presented in the present Annual Report.

Sudan	11		10	21
Jordan	7	4	5	16
Central African Republic	8	3	4	15
Ethiopia	6	2	7	15
Libya	0	4	7	11
Niger	4	3	4	11
Kenya	2	1	6	9
South Sudan	4	0	5	9
Somalia	4	1	4	9
Tanzania	7	0	2	9
Syria	1	3	3	7
Venezuela	1	0	5	6
Cameroon	1	1	4	6
Greece	2	0	4	6
Burkina Faso	6	0	0	6
Ukraine	1	0	4	5
Mali	3	1	0	4
Burundi	1	1	1	3
Denmark	0	0	3	3
Tunisia	1	0	1	2
Bosnia and Herzegovina	1	0	1	2
Serbia	1	0	0	1
Belgium	0	0	0	0
Mexico	0	0	0	0
Peru	0	0	0	0
Italy	0	0	0	0
Djibouti	0	0	0	0
Senegal (Regional Office)	0	0	0	0
Poland	0	0	0	0
Georgia	0	0	0	0
Kosovo	0	0	0	0
Sudan	0	0	0	0
Switzerland	0	0	0	0
Total	392	35	227	654

Table 3

Out of the 654 RSMs received in 2022, 80 were still open at the date of the data collection (7 March 2023), the vast majority being opened at Gate A (Country) level:

RSM Status	Gate A	Gate A+	Gate B	Total
Open	48	19	13	80
Closed	344	16	214	574
Total	392	35	227	654

Table 4

Type of Reported Misconduct

When reading the below table, it must be kept in mind that the data of the below table presents the number of instances certain types of misconduct (e.g. “Fraud & Corruption”) are used to tag RSMs at the moment of their registration in the system. In 2022, the first five types of misconduct are exactly the same as in 2021 (in the same order).

« Fraud & Corruption » remains the first type of misconduct reported, which is certainly due to its very broad definition. It has however slightly reduced in terms of proportion and now represents 22,6% of the types of misconduct reported (compared to 27,5% in 2021). While « SEAH » now represents 7,2% of the types of misconduct reported (compared to 8,8% in 2021), they continue to be a very important workload for the investigators at Gate B (HQ) level, and an important area of attention for DRC.

Type of Misconduct	Gate A	Gate A+	Gate B	Total
Corruption / fraud	169	25	68	262
Abuse of authority	146	18	74	238
Breach of duty	135	18	76	229
Workplace harassment	49	7	64	120
Unspecified	65	1	37	103
Racism / Discrimination	12	5	27	44
Sexual exploitation & abuse			43	43
Sexual harassment	2	4	35	41
Theft	33	1		34
Violence / assault	22		7	29
Retaliation	7		7	14
Total	640	79	438	1157

Table 5

Profile of Reporting Persons

It is encouraging to see that so many reports come from Programme Staff in International Operations because DRC is relying upon them to report suspicions of misconduct in the field and remote areas. Management in International Operations remains in the top three (3) categories which demonstrates their trust in the CoCRM, which is essential to ensure that it is adequately promoted within the organization.

The Persons of Concern now are the fourth highest category that complain (fifth highest category in 2020 and third in 2021) but this is not a source of concern as they may often report indirectly, via a staff member or directly through the local CFM. There remains a need for a continuous organisational effort towards building Persons of Concern’s awareness of the CoCRM as well as ensuring their safe and trusted access to the CoCRM or the CFM.

Anonymous complaints still form a significant proportion of RSMs. They are often difficult to process because the reporting person(s)’ lack of willingness to participate prevents the intake committee and the investigative team from collecting all necessary information, potential evidence and leads.

Complainant Type	Gate A	Gate A+	Gate B	Total
DRC Int. Op. - Current Programme Staff	103	6	41	150
DRC Int. Op. - Current Support Staff	64	8	39	111
DRC Int. Op. - Current Management	50	8	43	101
Persons of Concern	74	2	16	92
Anonymous	41	8	27	76
Other External Stakeholder	21		18	39
DRC Int. Op. - Former Programme Staff	12	1	5	18
DRC Int. Op. - Former Support Staff	3		11	14
Vendor	7		7	14
Implementing Partner	3	1	6	10
DRC Int. Op. - Former Management	2		7	9
(I)NGO	3		2	5
DRC DK - Current Staff	1	1	2	4
DRC DK - Former Staff	4			4
Public Authority	4			4
Donor			3	3
Total	392	35	227	654

Table 6

Profile of Subjects

For the second year, Management no longer is the group most complained about. It is noticeable that Management is mostly complained about via Gate B (HQ) level. It is expected that Gate A+ (Region) will receive a significant share of these reports in the future given the restructuring of the CoCRM and notably the new distribution of Safeguarding & Code of Conduct Functions.

Subject Type	Gate A	Gate A+	Gate B	Total
DRC Int. Op. - Current Programme Staff	151	2	20	173
DRC Int. Op. - Current Management	40	2	88	130
DRC Int. Op. - Current Support Staff	81	3	44	128
Unidentified	33	4	42	79
Incentive workers/volunteers/irregular - Current	35		7	42
Implementing Partner	12	1	7	20
Not Subject to CoC	12		3	15
DRC DK - Current Staff	5		1	6
DRC Int. Op. - Former Programme Staff	3		1	4
DRC Int. Op. - Former Management			4	4
DRC Int. Op. - Former Support Staff	1		2	3
DRC DK - Former Staff	1			1
Total	374	12	219	605

Table 7

Managers as Subjects of Concern

Although Managers are no longer the most reported category of staff, they remain the second most reported group complained about. The types of misconduct reported about Management remain largely related to workplace disputes (Abuse of authority, Workplace harassment and Breach of duty).

Highlights:

- Management is mainly reported about Abuse of Authority (30%), Workplace Harassment (18%), and Breach of Duty (17%).
- The number of RSMs involving Management and containing Fraud & Corruption allegation has reduced significantly from 67 (22%) in 2021 to 34 (11%) in 2022.
- The number of RSMs involving Management and containing « SEAH » allegations has slightly increased from 16 (5%) in 2021 to 20 (7%) in 2022.

Type of Response of the Intake Committee

Following the restructuring of the CoCRM, all RSMs are processed by Intake Committees at either Gate A+ (Region) or Gate B (HQ). In 2022, the restructuring was not yet rolled-out and Intake Committees were still in place at Gate A (Country) level. The response of the Intake Committee is linked to the Subject of misconduct. Hence, the number of Intake Committee decisions does not match with the number of RSMs received.

Intake Committees have limited options as responses (see table below) among which « Referral to Management » (35% compared to 34% in 2021) remains the most decided responses to RSMs. Although the new Code of Conduct is expected to clarify that minor misconducts are likely to be referred to Management by Intake Committees, the important number of such decision highlights the need to continue spreading awareness on how to best utilise the CoCRM.

« Investigation » (23% compared to 21% in 2021) remains the second type of Intake Response provided by Intake Committees. The number of investigations decided by Intake Committees is steady since 2020 (149 in 2020, 139 in 2021 and 137 in 2022) which shows that despite the increasing number of RSMs, the proportion of severe misconducts remains the same.

Intake Response	Gate A	Gate A+	Gate B	Total
Referred to Management	138	1	93	232
Investigation	92	5	40	137
Recorded for Info.	30	1	49	80
Referred to HR (contractual)	18		29	47
(blank)	39	2		41
Preliminary Assessment	17		3	20
More information	14			14
Referred to Management for Immediate Action	10	3		13
Referred to Country CoCRM	12			12
Referred to Another Organisation	4		4	8
Referred to Regional CoCRM			1	1
Total	374	12	219	605

Table 8

Outcomes of Investigations

DRC's substantiation rate has reduced moderately from 32% in 2018, 34% in 2019, 30% in 2020, 29% in 2021 and 28% in 2022.

Investigation Outcome	Gate A	Gate A+	Gate B	Total
Not Proven - Closure Report	36	2	24	62
Proven - Investigation Report	28	2	9	39
(blank)	28	1	7	36
Total	92	5	40	137

Table 9

Substantiation, as such, is not a goal for DRC, while ensuring consistent due process and fair investigations in application of DRC's principled CoCRM framework and Investigation Guidelines is a top priority. An investigation is a very resource-demanding process that should be administered with care. DRC therefore seeks to analyse and explain where there is a significant drop in substantiation rate (which is not the case in 2022) and there should be an increased focus on data quality regarding Investigation Outcome in order to reduce « blank » outcomes to zero.

Case Closure Time

The following tables show, by Gate and year, the number of calendar days passed between the date an RSM is received and the date it is closed in the database. While there has been a significant improvement globally (33% reduction of the Average Days to proceed with an RSM globally), the Case Closure Time is expected to improve as a consequence of both the restructuring of the CoCRM and the revision of the Code of Conduct.

2021				
Gate	30 days or less	Over 30 days	Average days	Median days
A	148	208	81	40
A+	1	13	155	112
B	141	100	46	25
Total	290	321	69	34

Table 10

2022				
Gate	30 days or less	Over 30 days	Average days	Median days
A	162	211	53	41
A+	3	9	48	39
B	164	55	35	10
Total	329	275	46	25

Table 11

When looking at the same Case Closure Time, but only for RSMs for which a formal internal investigation was decided by the Intake Committees, the improvement is also significant and of the same range. As a matter of example, the Average Days to proceed with an RSM via an investigation has reduced 33% from 2021 to 2022 (see next page).

Gate	2021			
	30 days or less	Over 30 days	Average days	Median days
A	14	80	129	113
A+	0	7	235	126
B	5	67	103	87
Total	19	154	123	103

Table 12

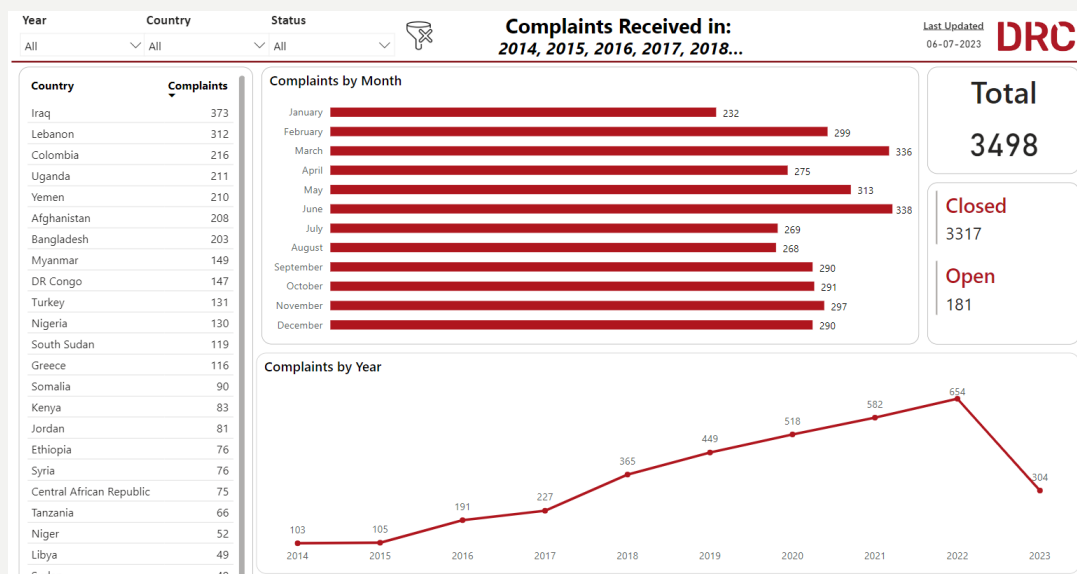
Gate	2022			
	30 days or less	Over 30 days	Average days	Median days
A	16	76	72	67
A+	0	5	41	35
B	4	36	108	95
Total	20	117	82	69

Table 13

The overall Case Closure Times is likely to be trending downward due to the important number of RSMs referred to Management (see above the Type of Response of Intake Committees), but the Case Closure Time for investigated RSMs is also trending downwards at the same pace (see above) which is evidencing that the investments made to capacitate the CoCRM and to professionalise investigations are benefiting the entire CoCRM, thereby allowing Management to take follow-up actions in a timely manner.

DRC Goes Public with CoCRM Data

DRC continues to make CoCRM data available to the public via its CoCRM Dashboard. In 2022, the CoCRM Dashboard was refreshed to facilitate its reading by the public and ensure it is updated on a daily basis. It can be accessed via the Code of Conduct page of DRC’s website ([Code of Conduct | DRC Danish Refugee Council](#)) or using the link here ([Microsoft Power BI](#)). The data presented in this Annual Report are dated 7 March 2023, discrepancies with the above data may therefore from time to time be observed.



Nota: the data shown in the above chart relating to 2023 should not be interpreted as a drop of RSMs. It only shows the current number of RSM received so far in 2023.



Founded in 1956, the Danish Refugee Council (DRC) is Denmark's largest international NGO, with a specific expertise in forced displacement. DRC is present in close to 40 countries and employs 7,500 staff globally.

DRC advocates for the rights of and solutions for displacement-affected communities, and provides assistance during all stages of displacement: In acute crisis, in exile, when settling and integrating in a new place, or upon return. DRC supports displaced persons in becoming self-reliant and included into hosting societies. DRC works with civil society and responsible authorities to promote protection of rights and inclusion.

Our 6,200 volunteers in Denmark make an invaluable difference in integration activities throughout the country.

DRC's code of conduct sits at the core of our organizational mission, and DRC aims at the highest ethical and professional standards. DRC has been certified as meeting the highest quality standards according to the Core Humanitarian Standard on Quality and Accountability.

HRH Crown Princess Mary is DRC's patron.

To read more about what we do, see: www.drc.ngo

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